## IN THE UNITED STATES BANKRUPTCY COURT OF THE DISTRICT OF DELAWARE

)	Chapter 11
)	Case No. 25-10068 (CTG)
)	
	) ) ) )

## **NOTICE OF APPEARANCE AND REQUEST FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that The Marketplace Tavares, LLC, f/k/a Tamburro Properties II, LLC ("Creditor"), hereby appears by its counsel, Garvan F. McDaniel of Hogan McDaniel. Such counsel hereby enters their appearances pursuant to section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code") and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"); and counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned case be given and served upon them at the following address, telephone and telecopy numbers:

Garvan F. McDaniel, Esquire
HOGAN McDANIEL
1311 Delaware Avenue
Wilmington, DE 19806
Telephone: (302) 656-7540
Telecopy: (302) 656-7599
gfmcdaniel@dkhogan.com

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned case and

proceedings therein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for

Notices and Papers shall not be deemed or construed to be a waiver of Creditor's rights: (i) to have

final orders in non-core matters entered only after de novo review by the United States District

Court for the District of Delaware (the "District Court"), (ii) to trial by jury in any proceeding so

triable in these cases or in any case, controversy, or proceeding related to these cases, (iii) to have

the District Court withdraw the reference in any matter subject to mandatory or discretionary

withdrawal, or (iv) of any other rights, claims, actions, set-offs, or recoupments to which Creditor

is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, set-offs,

and recoupments Creditor expressly reserves.

Dated: February 5, 2025

HOGAN♦MCDANIEL

/s/ Garvan F. McDaniel

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